

Barbara Cardwell
April 23, 2013
Deposition

Barbara Cardwell

April 23, 2013

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

POWELL VALLEY HEALTH CARE,)
INC.,)
)
Plaintiff,)
)
-vs-) CIVIL ACTION NO.
) 12-CV-0042-F
HEALTHTECH MANAGEMENT)
SERVICES, INC.,)
)
Defendant/Crossclaimant,)
)
-vs-)
)
PAUL CARDWELL and MICHAEL J.)
PLAKE,)
)
Defendants/Cross)
Defendants.)

DEPOSITION OF BARBARA CARDWELL

The deposition upon oral examination of BARBARA CARDWELL, a witness produced and sworn before me, Kelly S. Horsley, RPR, CSR #98-R-3004, Notary Public in and for the County of Hendricks, State of Indiana, taken on behalf of the Defendant/Crossclaimant, at the offices of Connor Reporting, Lafayette, Indiana, on the 23rd day of April, 2013, at 2:20 p.m., pursuant to the Federal Rules of Civil Procedure with written notice as to time and place thereof.

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1 **Q** And did he ever talk to you about buying stock
2 in a development company over there?

3 **A** No.

4 **Q** That doesn't ring a bell?

5 **A** No.

6 **Q** Okay. Are you familiar with the name
7 Clayton Wade?

8 **A** No.

9 **Q** Are you familiar with the name Evolution
10 Capital?

11 **A** No.

12 **Q** I wanted to --

13 **A** What are -- oh.

14 **Q** Not to worry.

15 **A** Okay.

16 **Q** If you were familiar with those names, then
17 there might be something to follow up; but since
18 you don't, we can move on.

19 The next thing I want to ask you about is
20 Michael Plake. Are you familiar with that name?

21 **A** Yeah, I know Mike.

22 **Q** And how long have you known Mike?

23 **A** Well, since he was in high school.

24 **Q** And was he a friend back then with your son?

25 **A** Yes, he was.

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1 **Q How would you describe their relationship over**
2 **the years?**

3 A Well, they kept in touch constantly. I mean,
4 you know, Paul had lots of friends and Mike was
5 just one. And he -- the relationship, I think,
6 was more like Mike seemed to kind of idolize
7 Paul. Does that -- you know, and he would even
8 come over and visit me sometimes when he'd come
9 back without prior knowledge that he was coming
10 or anything else. He would just come in, seemed
11 to enjoy, you know.

12 **Q He liked to hang out with you?**

13 A Well, he seemed to. He seemed to. He's a very,
14 I always thought a very, very nice guy; but the
15 circumstances of what has happened just makes me
16 sick for him, his wife, you know. I don't know
17 his wife, if that was her going out of here or
18 not.

19 **Q So you are not familiar with his wife?**

20 A No, I never met her.

21 **Q Okay. Did you ever learn that Paul Cardwell and**
22 **Michael Plake had some sort of business**
23 **together?**

24 A No, not until after, you know, it literally hit
25 the fan. I didn't know until then, and then

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1 STATE OF INDIANA)
) SS:
2 COUNTY OF HENDRICKS)

3

4 I, Kelly S. Horsley, RPR, a Notary Public in
5 and for the County of Hendricks, State of Indiana,
6 at large, do hereby certify that BARBARA CARDWELL,
7 the deponent herein, was by me first duly sworn to
8 tell the truth, the whole truth, and nothing but
9 the truth in the aforementioned matter;

10 That the foregoing deposition was taken on
11 behalf of the Defendant/Crossclaimant at the
12 offices of Connor Reporting, 300 Main Street, Suite
13 420, Tippecanoe County, Lafayette, Indiana, on the
14 23rd day of April, 2013, at 2:20 p.m., pursuant to
15 the Federal Rules of Civil Procedure;

16 That said deposition was taken down in
17 stenograph notes and afterwards reduced to
18 typewriting under my direction, and that the
19 typewritten transcript is a true record of the
20 testimony given by the said deponent; and that
21 signature was waived by the deponent and all
22 parties present, the deposition to be read with the
23 same force and effect as if signed by the deponent;

24 That the parties were represented by their
25 counsel as aforementioned.

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1 I do further certify that I am a disinterested
2 person in this cause of action, that I am not a
3 relative or attorney of either party or otherwise
4 interested in the event of this action, and that I
5 am not in the employ of the attorneys for any
6 party.

7 IN WITNESS WHEREOF, I have hereunto set my
8 hand and affixed my notarial seal on this _____
9 day of April, 2013.

10

11

12

N O T A R Y P U B L I C

13

14 My Commission Expires:

15 October 12, 2015

16 County of Residence:

17 Hendricks County

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